

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GLADYS ALVERIO WILLIAMS, Individually
and on behalf of a class,

Plaintiff,

vs.

**DEUTSCHE BANK NATIONAL TRUST COMPANY
and FEIN, SUCH & CRANE, LLP.**

Defendants.

**NOTICE OF MOTION FOR
SANCTIONS**

Civil Action No.
11-CV-2607

PLEASE TAKE NOTICE that Defendant Fein, Such & Crane, LLP (“Defendant” or “FSC”) will and hereby does move for an order of the Court imposing appropriate sanctions against Plaintiff and her Counsel, Shimshon Wexler, Esq., pursuant to Fed.R.Civ.P. Rule 11 for filing a frivolous and disingenuous claim against FSC.

This motion is based on this Notice of Motion and the Declaration of David P. Case, dated September 2, 2011, with Exhibits A and B.

DATED: October 10, 2011

HISCOCK & BARCLAY, LLP

By: /s/Dennis R. McCoy
Dennis R. McCoy

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